

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ALISON O'DONNELL,	)	CASE NO.: 1:16-cv-02480
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
v.	)	
	)	<b><u>PLAINTIFF'S MOTION TO STAY</u></b>
UNIVERSTIY HOSPITALS HEALTH	)	<b><u>RULING ON BILL OF COSTS</u></b>
SYSTEM, ET AL.	)	<b><u>PENDING APPEAL</u></b>
	)	
Defendants.	)	

Plaintiff, Alison O'Donnell by and through undersigned counsel, hereby moves this Honorable Court to stay any ruling over Defendants' requested Bill of Costs (Doc # 41) until the United States Sixth Circuit Court of Appeals has ruled on the appeal filed by Plaintiff regarding the Court's granting of summary judgment to Defendants in this matter. Plaintiff submits that a stay would promote judicial economy and efficiency because if the Court were to grant costs now, and the Court of Appeals then overturned any part of the Court's summary judgment decision, Plaintiff would then have to submit either a second appeal or otherwise move this Court to undue its ruling on the bill of costs because such costs would no longer be warranted. Conversely, if the Court of Appeals affirms the Court's ruling, the Court could then timely rule on Defendants' Bill of Costs. For these reasons, Plaintiff respectfully requests that her Motion be granted.

Respectfully Submitted,

/s/ Fred M. Bean

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of April, 2018, a copy of foregoing is being filed and served through Court's electronic filing system.

*/s/ Fred M. Bean*

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Fred M. Bean (0086756)

**THE SPITZ LAW FIRM, LLC**